

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: December 12, 2024 at 1:00 p.m. (ET)

Objection Deadline: December 6, 2024 at 4:00 p.m. (ET)

Ref. Nos. 27192 & 27205

**CERTIFICATION OF COUNSEL REGARDING DEBTORS’
ONE HUNDRED TWENTY-NINTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION
TO CERTAIN NO LIABILITY PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On October 23, 2024, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) filed the *Debtors’ One Hundred Twenty-Ninth (Non-Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Customer Claims)* [D.I. 27192, redacted & 27205, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 27192-1 & 27205-1], any responses to the Objection were to be filed no later than December 6, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. On December 6, 2024, Pavel Vorobets (“Vorobets”) filed a response to the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

Objection [D.I. 28605] (the “Vorobets Response”).

4. On December 6, 2024, Phillip Hunt (“Hunt”) filed a response to the Objection [D.I. 28606] (the “Hunt Response”).

5. On December 6, 2024, Matthew Rahe (“Rahe”) filed a response to the Objection [D.I. 28607] (the “Rahe Response”).

6. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the FTX Recovery Trust.

7. The FTX Recovery Trust is withdrawing the Objection solely with regard to the claims of Vorobets, Hunt, and Rahe without prejudice and with all rights of the parties reserved with regard thereto.

8. The FTX Recovery Trust has revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the withdrawals of the Objection solely with respect to the claims of Vorobets, Hunt and Rahe. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

9. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Revised Order at its earliest convenience.

Dated: February 4, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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